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Region 10
Hanford Project Office
712 Swift Boulevard, Suite 5
Richland WA 99352

December 20, 1990

Steven H. Wisness
Hanford Project Manager
U.S. Department of Energy
P.O. Box 550, A6-95
Richland, Washington 99352

Re: 618-9 Burial Ground Interim Response Action

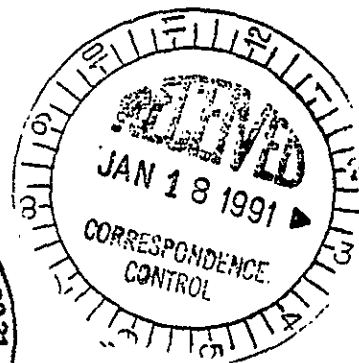
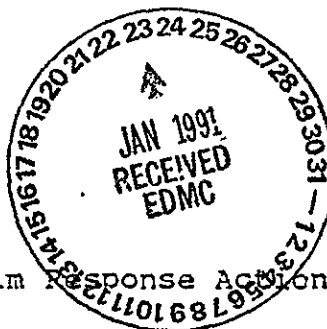
Dear Mr. Wisness:

The U.S. Environmental Protection Agency (EPA) and the Washington State Department of Ecology (Ecology) have reviewed the Interim Response Action (IRA) proposal for the 618-9 Burial Ground enclosed with your December 6, 1990 letter. Based upon that review, we believe that this project could successfully mitigate a threat (or potential threat) to the environment posed by the buried drums of uranium-contaminated hexone. We encourage you to proceed with detailed planning, including any non-intrusive field work necessary, to implement the project. For the purposes of this project, the EPA will be the lead regulatory agency and Ecology will be the support agency.

A final proposal will be required and must include sufficient detail for us to be able to prepare an Action Memorandum. The Action Memorandum will be the mechanism by which we approve start of investigative field work, and any removal actions.

The following items need to be addressed in the final proposal:

- We consider this action to be time-critical. If we proceed with this action, the excavation and drum handling should be performed in as cool weather as possible (hexone has a reasonably high vapor pressure, it has a Flash Point of 73 degrees F, and a TLV of 50 ppm). Therefore, for safety reasons, it is important to start as soon as we are prepared.
- Contingencies should be outlined, with activation points specified. Examples are the different actions taken if the drums are sound vs if the drums are not sound and stop work points under different weather conditions.



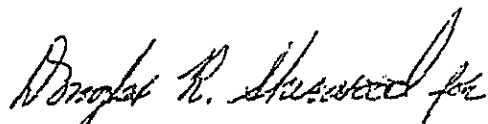
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December 20, 1990

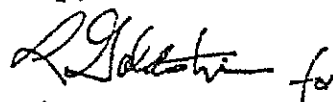
- If recovered, hexone is moved "off-site" (on-site is defined as the area where the action is taking place and those adjacent areas necessary for implementing the remedy), it must be handled in accordance with all administrative and substantive requirements of RCRA and WAC 173-303. If the final disposition of the hexone is to treat it in the Hexone Storage and Treatment facility in the 200-West Area, DOE will have to work with Ecology to determine whether a revision to the Part A permit application for that unit must be submitted. If the final disposition is treatment on-site, permits are not required, although all the substantive requirements of all applicable regulations must be met.
- ARARs must be identified, as removal actions must attain ARARs to the extent practicable.
- Opportunities for public involvement must be identified. As a time-critical action, there is no Engineering Evaluation/Cost Assessment to issue for comment. Instead, we need to tailor a meaningful project specific public involvement process. As part of this effort, we suggest that a fact sheet be prepared for this IRA to be used at the next Tri-Party quarterly meeting scheduled for mid-January. Additionally, we are requesting a project description to be submitted on the IRA no later than January 9, 1991.
- According to the October 18, 1990 Agreement in Principle, the funding for this project is in addition to that identified to meet previously identified activities required by the Tri-Party Agreement.

If you have any questions on the above, please do not hesitate to contact either one of us. Additionally, we intend to maintain regular staff interaction, allowing for early identification of issues or concerns.

Sincerely,



Paul T. Day
Hanford Project Manager
U.S. Environmental Protection
Agency



Timothy L. Nord
Hanford Project Manager
Washington State
Department of Ecology

cc: Willis Bixby, DOE
Roger Stanley, Ecology

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Author

PT Day/TL Nord

Addressee

SH Wisness/DOE-RL

Correspondence No.

Incoming: 9100231B

Subject 618-9 Burial Ground Interim Response Action

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